

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NOS. 2010-14--19-C

IN RE:)

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BellSouth Telecommunications,)
Incorporated d/b/a AT&T Southeast)
d/b/a AT&T South Carolina v.)
Affordable Phone Services, Incorporated)
d/b/a High Tech Communications)
Docket No. 2010-14-C)

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BellSouth Telecommunications,)
Incorporated d/b/a AT&T Southeast)
d/b/a AT&T South Carolina v. Dialtone)
& More Incorporated)
Docket No. 2010-15-C)

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BellSouth Telecommunications,)
Incorporated d/b/a AT&T Southeast)
d/b/a AT&T South Carolina v.)
Tennessee Telephone Service, LLC)
d/b/a Freedom Communications USA,)
LLC)
Docket No. 2010-16-C)

**REQUEST FOR TIME TO RESPOND TO
ORS RECOMMENDATION AND FOR
ORAL ARGUMENT**

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BellSouth Telecommunications,)
Incorporated d/b/a AT&T Southeast)
d/b/a AT&T South Carolina v. OneTone)
Telecom, Incorporated)
Docket No. 2010-17-C)

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BellSouth Telecommunications,)
Incorporated d/b/a AT&T Southeast)
d/b/a AT&T South Carolina v. dPi)
Teleconnect, LLC)
Docket No. 2010-18-C)

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BellSouth Telecommunications,)
Incorporated d/b/a AT&T Southeast)
d/b/a AT&T South Carolina v. Image)
Access, Incorporated d/b/a New Phone)
Docket No. 2010-19-C)

All of the Respondents in the above-listed Dockets (collectively the “Joint CLECS”), respectfully request leave for the Respondents to file a response to the South Carolina Office of Regulatory Staff’s (“ORS”) recommendations set forth in its April 6, 2011 correspondence (the “ORS Recommendations”). The Joint CLECs respectfully request, for the reasons set forth herein, that they be allowed thirty (30) days to do so, and that oral argument be scheduled following the filing of that response.

Before April 6, 2011, the ORS had not presented any testimony, presented any argument to the Commission, cross-examined any witness, or otherwise taken a position in these Dockets. In fact, counsel for the ORS made clear at the hearing on December 16, 2010 that the ORS would not be “actively participating” in these Dockets.

The ORS Recommendations present a theory of this case and these Dockets that is entirely new to the Joint CLECs. The ORS Recommendations present a novel and complicated proposal that has the potential to impact the recovery of millions of dollars, and accordingly the viability of the Joint CLECs. Very significantly, the Joint CLECs’ witnesses have had no opportunity to present testimony to the Commission regarding this theory of the case, and counsel for the Joint CLECs have had no opportunity to provide arguments to the Commission in response to the ORS Recommendations. Similarly, the presentation of the ORS Recommendations to the Commission following the hearing leaves the Joint CLECs with no ability to explore the factual bases and other underlying support for this position.

Therefore, if the Commission intends to consider the ORS Recommendations as part of its decision-making process, the Joint CLECs are entitled at the very least to a meaningful opportunity to analyze same and respond appropriately. Because of the fact

that the ORS Recommendations were made after the record had closed in this case, the Joint CLECs are also entitled to have the Commission conduct oral arguments following the filing of their response.

Wherefore, for the state reasons, the Joint CLECs request that they be allowed until May 6, 2011 to file a response to the ORS Recommendations, that the Commission schedule oral argument following the Joint CLEC filing, and grant such other relief as is just and proper.

Respectfully submitted,

/s/ John J. Pringle, Jr.

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April 20, 2011

Columbia, South Carolina

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served by electronic mail service on the following this 20th day of April, 2011:

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/s/ John J. Pringle, Jr.